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PRO SE OFFICE

UNITED STATES DISTRICT COURT
Southern District of New York


Continental Petroleum Corporation,)
INC. and Plastitex, S.A.)
Plaintiffs,)
vs.)
Corporate Funding Partners, LLC)
and Pablo Antoniazzi, an)
individual, Caren Raphael, Joseph)
Lau, Green Pampas, Inc.)
Defendants)

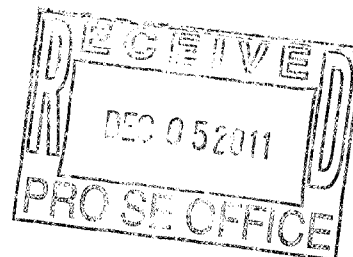
Civil Action No. 11-CV-7801

MOTION TO DISMISS

Pursuant to Rule 12 of the Federal Rules of Civil Procedure, Defendant Joseph Lau hereby moves the Court to dismiss Plaintiffs' Complaint with prejudice. The basis for this Motion is that the Plaintiffs have mistakenly sued the wrong Joseph Lau as further set forth in the accompanying Memorandum.

Dated this 5th day of December, 2011


Joseph C. Lau
28 Sousa Drive
Port Washington, NY 11050



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INC. and Plastitex, S.A.)

Plaintiffs,)

vs.)

Corporate Funding Partners, LLC)

and Pablo Antoniazzi, an)

individual, Caren Raphael, Joseph)

Lau, Green Pampas, Inc.)

Defendants)

Civil Action No. 11-CV-7801

MEMORANDUM IN SUPPORT
OF MOTION TO DISMISS

FACTS

Named Defendant Joseph Lau or Joseph C. Lau residing at 28 Sousa Drive, Port Washington, NY 11050 is not the same individual as Joseph Lau, the Chief Processing Officer of CORPORATE FUNDING PARTNERS, headquartered at 201 West 72 St. 6M, New York, NY 10023. The Joseph Lau at CORPORATE FUNDING PARTNERS can be reached at email: joe.lau@lettercredit.com, phone (212) 724-8333 ext. 112. The individual defendants named in this action are officers or representatives of CORPORATE FUNDING PARTNERS. However, Joseph C. Lau was a full-time employee of ABN AMRO Inc. from 2002 to 2009.

ARGUMENT

I. Plaintiffs' Complaint Has Been Filed Against the Wrong Joseph Lau

Plaintiffs' claims against Joseph C. Lau of 28 Sousa Drive must be dismissed because their legal claims against him are totally without merit. Joseph C. Lau has never had any contact nor entered into any contract, agreement or any other dealings with the Plaintiffs. Likewise, Joseph C. Lau is not connected in any way with the other defendants in this action and has never had any contact or dealings with CORPORATE FUNDING PARTNERS nor with its officers and representatives. Joseph C. Lau was an officer of ABN AMRO Inc. working in equity derivatives during 2008 and 2009 at the time the purported transactions occurred as described in this action. Attorneys for Plaintiffs have wrongfully and erroneously sued Joseph C. Lau in this action.

CONCLUSION

For the reasons stated above, Defendant's Motion to Dismiss should be granted, or in the alternative, that the correct Joseph Lau be substituted in this action as the Court deems proper.

Dated this 5th day of December, 2011

A handwritten signature in black ink, appearing to read "Joseph C. Lau", is written over a horizontal line.

Joseph C. Lau
28 Sousa Drive
Port Washington, NY 11050

CERTIFICATION OF SERVICE

I hereby certify that, on the date below, a copy of the above was dispatched via
U.S. Mail, First Class, to Plaintiffs' counsel as follows:

Frederick J. Castro, Esq.
V. Gonzalez & Associates, P.C.
121 North 10th Street
McAllen, Texas 78501

By: 

Joseph C. Lau

Dated: December 5, 2011